

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO**

In Re

**FRANK EDWARD EATON and
ADELA VASQUEZ EATON,
Debtors.**

Case No. 15-12439 t

**DEBTOR'S RESPONSE TO RREF'S
MOTION TO CONVERT**

Debtors through their attorney of record, R. "Trey" Arvizu, III file this Response to Creditor, RREF's, Motion to Convert based on the following grounds:

1. The Debtors' plan meets all the requirements of 11 U.S.C. §1325 as will be shown in a confirmation hearing.
2. The transfers made by the Debtors were not for the purpose or intention of hindering or delaying creditors.
3. Creditor has failed to state a cause for relief allowable pursuant to 11 U.S.C. §1307(c).
4. In the event the Court rules against Debtors herein, Debtor moves the Court for immediate dismissal pursuant to 11 U.S.C. §1307(b).

WHEREFORE, Debtors respectfully request that the Motion to Convert be denied at this time.

Electronically filed
R. "Trey" Arvizu, III
Attorney for Debtors
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CERTIFICATE OF SERVICE

I CERTIFY that the foregoing was electronically filed with the Court via the CM/ECF system. All attorneys and parties identified with the Court for electronic service on the record in this case were served by electronic service in accordance with the CM/ECF system on this 10th day of November, 2015.

Electronically filed

R. "Trey" Arvizu, III